

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MAGTEN ASSET MANAGEMENT CORP.)	
and LAW DEBENTURE TRUST COMPANY)	
OF NEW YORK,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 04-1494-JJF
)	
NORTHWESTERN CORPORATION,)	
)	
Defendant.)	
)	
MAGTEN ASSET MANAGEMENT CORP.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 05-499-JJF
)	
MIKE J. HANSON and ERNIE J. KINDT.)	
)	
Defendants.)	

NOTICE OF COMPLETION OF BRIEFING AND REQUEST FOR ORAL ARGUMENT

Plaintiffs Magten Asset Management Corporation and the Law Debenture Trust Company of New York hereby provide notification that briefing was completed on May 2, 2007 on Plaintiffs' Emergency Motion Seeking Orders (a) Shortening the Briefing Schedule Under Local Rule 7.1.2 and Setting a Hearing Date before the Special Master; (b) Determining Privilege Status of Documents NorthWestern Seeks to Recall Under Claim of Inadvertent Production and Privilege; (c) Compelling NorthWestern to Produce Non-Privileged Documents; (d) Compelling NorthWestern to Produce Legible Versions of Documents Produced in Illegible Form; (e) Extending the Period for Completing Depositions; and (f) Assessing Fees and Costs Against NorthWestern (the "Motion") (D.I. 139 in Case 04-1494; and D.I. 175 in Case 05-499).

Additionally, Plaintiffs hereby request oral argument on the Motion pursuant to Local Rule 7.1.4.

Dated: Wilmington, Delaware
May 3, 2007

Respectfully submitted,

BLANK ROME LLP

SMITH, KATZENSTEIN & FURLOW, LLP

/s/ Dale R. Dubé
Dale R. Dubé (DE No. 2863)
David W. Carickhoff (DE No. 3715)
1201 Market Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 425-6400
Facsimile: (302) 425-6464

/s/ Kathleen M. Miller
Kathleen M. Miller (DE No. 2898)
800 Delaware Avenue, 7th Floor
P.O. Box 410
Wilmington, DE 19899
Telephone: (302) 652-8400
Facsimile: (302) 652-8405

- and -

-and-

**FRIED, FRANK, HARRIS, SHRIVER
& JACOBSON LLP**

Bonnie Steingart
Gary L. Kaplan
John W. Brewer
One New York Plaza
New York, NY 10004
Telephone: (212) 859-8000
Facsimile: (212) 859-4000

Counsel for Magten Asset Management
Corporation

NIXON PEABODY LLP

John V. Snellings
Amanda Darwin
100 Summer Street
Boston, MA 02110
Telephone: (617) 345-1201
Facsimile: (866) 947-1732

Counsel for Law Debenture Trust
Company of New York

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of May, 2007, I served by hand delivery and electronic filing the NOTICE OF COMPLETION OF BRIEFING AND REQUEST FOR ORAL ARGUMENT, using CM/ECF which will send notification of such filing(s) to the following:

BY EMAIL AND HAND DELIVERY

Denise Seastone Kraft, Esquire
Edwards Angell Palmer & Dodge LLP
919 North Market Street, 15th Floor
Wilmington, DE 19801

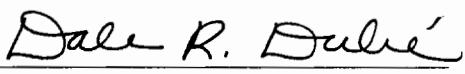
Victoria Watson Counihan, Esquire
Dennis A. Meloro, Esquire
Greenberg Traurig LLP
The Nemours Building
1007 North Orange Street, Suite 1200
Wilmington, DE 19801

I also certify that, on this 3rd day of May, 2007, I served the aforementioned document, by e-mail and Federal Express, upon the following participants:

BY EMAIL AND FEDERAL EXPRESS

Stanley T. Kaleczyc, Esquire
Kimberly A. Beatty, Esquire
Browning, Kaleczyc, Berry & Hoven, P.C.
139 North Last Chance Gulch
P.O. Box 1697
Helena, Mt 59624

Steven J. Reisman, Esquire
Joseph D. Pizzurro, Esquire
Nancy E. Delaney, Esquire
Miriam K. Harwood, Esquire
Curtis, Mallet-Prevost, Colt & Mosle LLP
101 Park Avenue
New York, New York 10178-0061


Dale R. Dubé (No. 2863)